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ECF

Hon. Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

**Re: U.S. v. JOHN, et al., including Olawale Olaniyan Dkt. No. 21 CR. 609 (LAP)
U.S. Pretrial Consents, and Government Defers, to Defense Request for
Modification of Bond Conditions to Expand Travel to the Districts of New
Jersey, Connecticut, and Eastern Pennsylvania for Purposes of Employment.**

Dear Judge Preska:

As reported in the U.S. Pretrial Services report, Mr. Olawale Olaniyan is an Uber driver in the New York metropolitan area whose employment at times includes chauffeuring passengers to the above-listed districts. For this reason, he respectfully requests a modification of his travel restrictions to include chauffeuring passengers to these districts. The Government defers to U.S. Pretrial which consents to this modification for employment purposes only.

If there are any questions regarding this request, I am available to The Court immediately at (917) 751-5754.

Thank you.

Respectfully submitted,
s/ Richard Palma
Richard Palma (Bar No. rp 4441)

cc: USPO Robert Boose & AUSA Kaylan Lasky (via email)

Defendant's travel restrictions
are modified to permit
chauffeuring passengers in the
above-listed districts for
employment purposes only.
SO ORDERED.

RICHARD PALMA
ATTORNEY AT LAW

Loretta A. Preska 10/18/2021

LORETTA A. PRESKA, U.S.D.J.